

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2009-489-E

IN RE:

Application of South Carolina Electric & Gas,)	
Company for Increases and Adjustments in)	PETITION TO INTERVENE
Electric Rate Schedules and Tariffs)	

The Women’s Shelter hereby petitions the South Carolina Public Service Commission (“Commission”) to intervene and be made a party of record in the above-captioned docket, pursuant to R.103-825 of the Commission's Rules and Regulations. The Women’s Shelter states the following grounds in support of its petition:

1. The Women’s Shelter is a non-profit agency that shelters women in crisis. The Women’s Shelter undertakes a comprehensive effort to transition women out of crisis and into responsible productive lives. To that end, The Women’s Shelter owns and operates 17 properties in SCE&G’s service area, including the primary crisis shelter and a number of transitional housing units. Therefore, The Women’s Shelter purchases large quantities of electricity from SCE&G, which is a significant portion of The Women’s Shelter’s cost of operations. In addition, the women, children and families that The Women’s Shelter helps are deeply impacted by even the slightest increase in monthly budget items, like electricity and gas, which they must purchase in order to survive. For many of these women, transitioning towards independence, or trying to make it after transitioning out of The Women’s Shelter’s housing, such a significant increase in the cost of power could be the difference between success and failure. The Women’s Shelter has a direct and material interest in the issues to be addressed and resolved by the Commission in this docket, and these interests cannot be adequately represented by another party in this proceeding.

2. At this stage of the proceeding, The Women's Shelter does not have sufficient information to determine what positions it will take.

3. The Women's Shelter's mailing address is:

The Women's Shelter
3425 North Main Street
Columbia, SC 29203

4. Service and correspondence regarding this proceeding should be sent to:

Stephen Suggs
Susan B. Berkowitz
South Carolina Appleseed Legal Justice Center
1518 Washington Street
Columbia, SC 29201
Tel No. (803) 779-1113, ext. 106
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Email: ssuggs@scjustice.org

5. Once SCE&G files its direct testimony, The Women's Shelter shall review it and determine whether to file responsive testimony, and if so, by whom. It will inform the Commission as to the amount of time needed for that witness to present his direct testimony.

6. Granting The Women's Shelter's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns may be developed.

WHEREFORE, for the reasons set forth above, The Women's Shelter respectfully requests permission to intervene in this proceeding.

Signature Page Attached

Respectfully submitted,

s/ Stephen Suggs
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Attorneys for The Women's Shelter

March 22, 2010